

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANU BHARDWAJ,

X

08-cv-6059(dab)

Plaintiff,

**MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

v.

DEBORA A. GUTHRIE, JOSEPH F. KELLY, JR.,
ESQUIRE, CAPITOL HEALTH ADVISORS, LP,
CAPITOL HEALTH GLOBAL, INC., CAPITOL
HEALTH GLOBAL, LLC, CAPITOL HEALTH, INC.,
CAPITOL HEALTH CONSULTANTS, INC., CAPITOL
HEALTH MANAGEMENT COMPANY LLC,
CAPITOL HEALTH MANAGEMENT CORPORATION,
CAPITOL HEALTH PARTNERS, LP, CAPITOL
HEALTH MANAGEMENT COMPANY II, INC.,
CAPITOL HEALTH PARTNERS III, LP, CAPITOL
HEALTH ADVISORS III, LLC, CAPITOL HEALTH
MANAGEMENT COMPANY III, INC., ABC
CORPORATIONS, XYZ PARTNERSHIPS/LIMITED
PARTNERSHIPS, JANE DOE AND RICHARD ROE,

Defendants.

X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Todd E. Duffy, a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission *pro*
hac vice of :

Cherie K. Durand
Hulsey Law Group
Charleston Harbor
2 Wharfside 3
Charleston, South Carolina 29401
Tel: (843) 723-5303
Fax: (843) 723-5307

Cherie K. Durand is a member in good standing of the Bars of the State of South Carolina
and the State of Virginia. *See* Exhibit A, annexed hereto. There are no pending

disciplinary proceedings against Cherie K. Durand in any State or Federal court. In addition, Cherie K. Durand was admitted *pro hac vice* in a case pending before this Court, captioned *Ovesen v. Mitsubishi et al.*, Civil Case No. 04-cv-02849 (JGK), on February 26, 2008.

Dated: July 29, 2008
New York, New York

Respectfully submitted,

DUFFY & ATKINS LLP

A handwritten signature in black ink, appearing to read "Todd E. Duffy", is written over a horizontal line.

Todd E. Duffy (TD 9863)
Seven Penn Plaza, Suite 420
New York, New York 10001
Tel: (212) 268-2685
Fax: (212) 500-7972

EXHIBIT A

The Supreme Court of South Carolina

Certificate of Good Standing

I, Daniel E. Shearouse, Clerk of the Supreme Court of South Carolina, do hereby certify that Cherie K. Durand was duly sworn and admitted as an attorney in this state on April 1, 2008, and is currently an active member of the South Carolina Bar.

DANIEL E. SHEAROUSE, CLERK

BY Gayle B. Watts
DEPUTY CLERK FOR BAR ADMISSIONS

Columbia, South Carolina

July 17, 2008

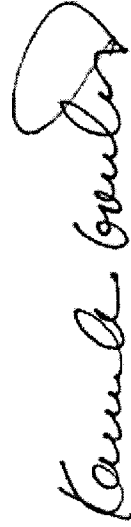


VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

*This is to certify that **CHERIE KAY DIBBELL DURAND** is an active member of the Virginia State Bar in good standing. **MRS. DURAND** was licensed to practice law in Virginia on **OCTOBER 5, 1990**, after successfully passing the bar examination given by the Virginia Board of Bar Examiners.*

Issued July 21, 2008


Karen A. Gould
Executive Director and
Chief Operating Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANU BHARDWAJ, X

Plaintiff,

v.

DEBORA A. GUTHRIE, JOSEPH F. KELLY, JR.,
ESQUIRE, CAPITOL HEALTH ADVISORS, LP,
CAPITOL HEALTH GLOBAL, INC., CAPITOL
HEALTH GLOBAL, LLC, CAPITOL HEALTH, INC.,
CAPITOL HEALTH CONSULTANTS, INC., CAPITOL
HEALTH MANAGEMENT COMPANY LLC,
CAPITOL HEALTH MANAGEMENT CORPORATION,
CAPITOL HEALTH PARTNERS, LP, CAPITOL
HEALTH MANAGEMENT COMPANY II, INC.,
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MANAGEMENT COMPANY III, INC., ABC
CORPORATIONS, XYZ PARTNERSHIPS/LIMITED
PARTNERSHIPS, JANE DOE AND RICHARD ROE,

Defendants.

X

08-cv-6059(dab)

**AFFIDAVIT OF TODD E.
DUFFY IN SUPPORT OF
MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

Todd E. Duffy, being duly sworn hereby deposes and says as follows:

1. I am a member of the law firm of Duffy & Atkins LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Cherie K. Durand as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bars of the State of New York and New Jersey and was admitted to practice law in New York in 2000 and in New Jersey in 1999. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Cherie K. Durand, a member of the Hulsey Law Group, since 2007 and have found her to be a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure. In addition, Cherie K. Durand has been admitted *pro hac vice* in a matter presently pending before the Court, captioned *Ovesen v. Mitsubishi et al.*, Civil Case No. 04-cv-02849 (JGK).


4. Accordingly, I am pleased to move the admission of Cherie K. Durand, *pro hac vice*.

5. I respectfully submit a proposed order granting the admission of Cherie K. Durand, *pro hac vice*, which is attached hereto as Exhibit A.

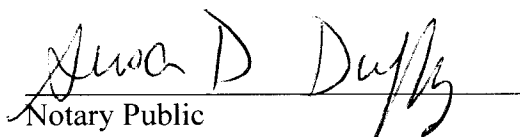
WHEREFORE it is respectfully requested that the motion to admit Cherie K. Durand, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,

Dated: August 5, 2008
New York, New York


Todd E. Duffy (TD 9863)

Sworn before me this
5th day of August, 2008


Notary Public

SUSAN D. DUFFY
Notary Public, State of New York
No. 02DU6168953
Qualified in Queens County
Commission Expires June 18, 2011

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANU BHARDWAJ Plaintiff,

08 cv 6059 (dab)

- against -

DEBORA A. GUTHRIE, ET AL. Defendant.

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Todd E. Duffy attorney for Plaintiff Anu Bhardwaj
and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Applicant's Name: Cherie K. Durand
Firm Name: Hulsey Law Group
Address: 2 Wharfside 3
City/State/Zip: Charleston, South Carolina 29401
Telephone/Fax: (843) 723-5303
Email Address: chdurand@hulseylitigationgroup.com

is admitted to practice pro hac vice as counsel for Plaintiff Anu Bhardwaj in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State:

United States District/Magistrate Judge

DUFFY & ATKINS LLP

Seven Penn Plaza, Suite 420

New York, New York 10001

Todd E. Duffy (TD 9863)

James E. Atkins (JA 4922)

Dennis J. Nolan (DN 0853)

Attorneys for Anu Bhardwaj

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
ANU BHARDWAJ,

08-cv-6059 (dab)

Plaintiff,

v.

AFFIDAVIT OF SERVICE

DEBORA A. GUTHRIE, JOSEPH F. KELLY, JR.,
ESQUIRE, CAPITOL HEALTH ADVISORS, LP,
CAPITOL HEALTH GLOBAL, INC., CAPITOL
HEALTH GLOBAL, LLC, CAPITOL HEALTH,
INC., CAPITOL HEALTH CONSULTANTS, INC.,
CAPITOL HEALTH MANAGEMENT COMPANY
LLC, CAPITOL HEALTH MANAGEMENT
CORPORATION, CAPITOL HEALTH PARTNERS,
LP, CAPITOL HEALTH MANAGEMENT
COMPANY II, INC., CAPITOL HEALTH
PARTNERS III, LP, CAPITOL HEALTH ADVISORS
III, LLC, CAPITOL HEALTH MANAGEMENT
COMPANY III, INC., ABC CORPORATIONS,
XYZ PARTNERSHIPS/LIMITED PARTNERSHIPS,
JANE DOE AND RICHARD ROE,

Defendants.

-----X
STATE OF NEW YORK)

: ss.:

COUNTY OF NEW YORK)

SASHA L. MARTIN, being duly sworn and deposed says:

1. I am not a party to this action, am over eighteen years of age and reside in Bronx, New York.
2. That on the 5th day of August, 2008, I caused a true and correct copy of the following:
 - Motion To Admit Cherie K. Durand as Counsel *Pro Hac Vice*;

- Affidavit Of Todd E. Duffy In Support Of Motion To Admit Cherie K. Durand as Counsel *Pro Hac Vice*; and
- Order For Admission *Pro Hac Vice* On Written Motion.

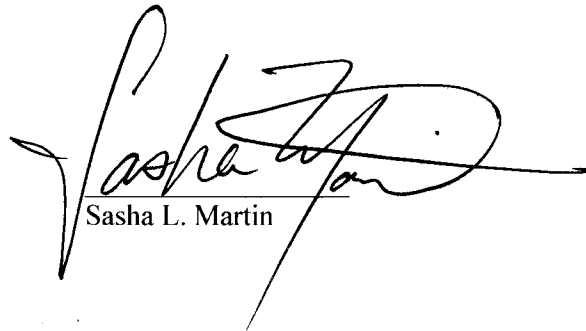
to be served by United States postal mail, postage prepaid upon the following:

Jonathan D. Perry, Esq.
Dechert LLP
1095 Avenue of the Americas
New York, New York 10036
Attorneys for Defendants

Dated: August 5, 2008
New York, New York

Sworn to before me this
5th day of August, 2008


Todd E. Duffy


Sasha L. Martin

TODD ERIC DUFFY
Notary Public, State of New York
No. 02DU6047594
Qualified in New York County
Commission Expires Sept. 5, 2010